

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TIMOTHY STEELE and JUDITH STEELE, H/W)	Civil Action No. 09-02837
)	
)	
Plaintiffs,)	
)	
)	
v.)	
)	
)	
BLAKE & UHLIG, P.A., LAUREN FLETCHER, and BOILERMAKERS NATIONAL HEALTH & WELFARE FUND,)	
)	
)	
Defendants.)	
)	
)	

**PLAINTIFFS' CONSOLIDATED RESPONSE IN OPPOSITION TO DEFENDANTS
BLAKE & UHLIG, P.A. AND LAUREN FLETCHER'S MOTION TO DISMISS
PLAINTIFFS' COMPLAINT OR ALTERNATIVELY TO TRANSFER VENUE AND IN
OPPOSITION TO DEFENDANT BOILERMAKERS NATIONAL HEALTH & WELFARE
FUND'S MOTION TO TRANSFER VENUE**

Plaintiffs, through their undersigned counsel, hereby oppose Defendants Blake & Uhlig, P.A. and Lauren Fletcher's Motion to Dismiss Plaintiffs' Complaint. Plaintiff further hereby oppose Defendants Boilermakers National Health and Welfare Fund, Blake & Uhlig, P.A. and Lauren Fletcher's Motion to Transfer Venue. For the reasons set forth in the accompanying memorandum of law, which is incorporated by reference herein, Defendants' motions should be denied.

Respectfully Submitted,

FRANCIS & MAILMAN, P.C.

BY: /s/ James A. Francis
JAMES A. FRANCIS
Land Title Building, 19th Floor
100 South Broad Street
Philadelphia, PA 19110
(215) 735-8600

Date: September 16, 2009